

# Exhibit I

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

RUTH SMITH, individually and  
on behalf of all others Case No. 1:22-cv-00081-LMB-WEF  
similarly situated,  
Plaintiff,  
vs.  
SUNPATH, LTD, a Massachusetts  
corporation,  
Defendant.

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VIDEOCONFERENCED 30(b)(6) DEPOSITION OF SUNPATH, LTD  
(through ANDREW GARCIA)  
December 8, 2022

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VIDEOCONFERENCED APPEARANCES:

ON BEHALF OF THE PLAINTIFF:

PATRICK H. PELUSO, ESQ.  
Woodrow & Peluso, LLC  
3900 E. Mexico Avenue, Suite 300  
Denver, Colorado 80210  
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Email: ppeluso@woodrowpeluso.com

ON BEHALF OF THE DEFENDANT:

GREGORY CAFFAS, ESQ.  
Roth Jackson Gibbons Condlin  
8200 Greensboro Drive, Suite 820  
McLean, Virginia 22102  
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Email: gcaffas@rothjackson.com

Also Present: Paul Sporn, Esq.

1 with you about is Topic 24 here, that says, "Your sources  
2 of revenue, including the portion of your revenue that is  
3 generated from sales made by third parties acting on your  
4 behalf."

5 So just, you know, to sort of -- to frame  
6 this a little bit, I'm not asking you to disclose  
7 SunPath's total revenue; right? Give me a number. I'm  
8 not asking that. And I -- I understand sort of your  
9 consistent statement through this deposition that third  
10 parties don't act on your behalf. So let's sort of  
11 reframe this to -- a way that I think everyone can agree.

12 I'm interested in understanding the portion  
13 of SunPath's revenue that is generated from sales made by  
14 third parties who sell SunPath's service contracts.

15 Is that 100 percent of SunPath's revenue?  
16 Is it 10 percent? What sort of chunk of its revenue do  
17 you think is generated by third-party sales?

18 A. 100 percent of our revenue is from third  
19 parties because we don't do any selling.

20 MR. PELUSO: Okay. Easy enough. I don't  
21 really have anything else. I'll turn it over to Greg.

22 EXAMINATION

23 BY MR. CAFFAS:

24 Q. Great. First things first. I just want to  
25 address that last line of questioning that Pat just